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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY PARHAM,  
JANE DOE, and  
JOHN DOE  
  
Plaintiffs,  
  
v.

Case No.: 3:24-cv-07191-RFL

SEAN COMBS a/k/a  
“P. Diddy,” “Puff Daddy,” “Love,”  
“Puffy” and “Diddy,”  
KRISTINA KHORRAM,  
SHANE PEARCE,  
RUBEN VALDEZ,  
JOHN PELLETIER,  
ODELL BECKHAM JR.,  
DREW DESBORDES a/k/a “Druski,”  
JACQUELYN WRIGHT a/k/a “Jaguar  
Wright”, HELENA HARRIS-SCOTT,  
MATIAS GONZALEZ,  
BRANDI CUNNINGHAM,  
JANICE COMBS,  
KEITH LUCKS a/k/a “Big Homie CC,”  
and JOHN and JANE DOES 1-10

**DECLARATION OF JANE DOE  
IN SUPPORT OF MOTION TO  
PROCEED UNDER  
PSEUDOYNM**

Defendants.

I, Jane Doe, declare and certify as follows:

1. I am the Plaintiff in the above styled cause.

- 1       2. I have been a victim of sex trafficking, on multiple occasions, at the hands of the  
2           Defendants in this matter.
- 3
- 4       3. I have been kidnapped by Defendants in this matter.
- 5
- 6       4. Based on my understanding and interactions with Defendants in this matter, I believe that  
7           the Defendants were members of a gang involving sex trafficking and kidnapping.
- 8
- 9       5. The people who trafficked and exploited me physically bound me, transported me against  
10           my will, beat me and forced me to engage in unwanted sexual activity. The traffickers have  
11           threatened to kill me during these trafficking episodes.
- 12
- 13       6. I was trafficked at the direction of Defendant Combs. The co-Defendants named within our  
14           complaint hurt me and threatened to kill me during the times I was trafficked by them.
- 15
- 16       7. In order to evade Defendants I have changed my name, live in a remote location and hide  
17           my person while in public.
- 18
- 19       8. I remain fearful for my life and my son's life, John Doe because the people who trafficked  
20           and exploited us continue to find us. We recently had someone on our remote property  
21           taking pictures and believe that individual was connected with one of the Defendants in this  
22           matter.
- 23
- 24       9. I have overwhelming fear and anxiety that the same people who trafficked me before will  
25           find me and would kill me next.
- 26
- 27       10. I believe that the one of the Defendants and/or their affiliates sent that individual to search  
28           for John Doe and I in order to threaten and intimidate us.

1 11. John Doe and I live in constant fear of the people, Defendants in this matter who harmed  
2 and exploited us and the people who worked with Defendant Combs to aid him in his  
3 criminal activity.

4  
5 12. Defendant Combs is currently on criminal trial for acts related to threatening harm, and  
6 actually inflicting harm, on others who went against him.

7  
8 13. Throughout Defendant Combs' criminal trial, which has been highly publicized, I  
9 continued to learn about the violent actions, harms and injuries that Defendant Combs has  
10 inflicted on others and his graphic sexual exploitation of others.

11  
12 14. I became increasingly fearful about my safety, so much so that I have become reclusive and  
13 am afraid to venture out of my remote location for anything not rising to an emergency.

14  
15 15. Both my safety and privacy are important to me, and so having my real name disclosed  
16 repeatedly in connection with the sensitive facts of this case will undoubtedly cause me  
17 hardship and great stress.

18  
19 16. Please allow me to proceed under the pseudonym Jane Doe for my safety and privacy in  
20 this case.

21 I declare under the penalty of perjury under the laws of the United States of America that the  
22 foregoing is true and correct.

23  
24 Dated: June 8, 2024

25 RESPECTFULLY SUBMITTED,

26 /s/Jane Doe

27 Plaintiff  
28